

Dickinson Bay Area Branch NAACP, et al., v. Galveston County, No. 3:22-cv-17-JVB, No. 3:22-cv-57-JVP (Lead Consol. Case) (S.D. Tex. 2022)

NAACP PLAINTIFFS' PRIVILEGE LOG

April 18, 2023

EXHIBIT 1

Entry No.	Relativity ID	Doc Type	Master Date	Sender	Recipient	Copied	Blind-Copied	Attachment Count	Privilege	Privilege Notes
1	KD0222WF00000639	msg	4/16/2021	[Redacted – First Amendment Privileged Membership Identity]	[Redacted – First Amendment Privileged Membership List]			1	Non-privileged family member	Non-responsive parent email to responsive document, Relativity ID KD0222WF00000640
2	KD0222WF00000640	doc	4/16/2021						First Amend.	LULAC Council 151 Meeting Agenda for April 20, 2021 reflects internal, deliberative communications within membership on a number of areas, including Redistricting.
3	KD0222WF00000196	msg	5/7/2021	[Redacted – First Amendment Privileged Membership Identity]	[Redacted – First Amendment Privileged Membership Identity]			0	First Amend.	Internal NAACP Communication from SE Field Office to NAACP Leaders regarding training and strategy, including redistricting training.
4	KD0222WF00000169	msg	5/21/2021	[Redacted – First Amendment Privileged Membership Identity]	[Redacted – First Amendment Privileged Membership Identity]			0	First Amend.	Internal NAACP Communication from SE Field Office to NAACP Leaders regarding training and strategy, including redistricting training.
5	KD0222WF00000224	msg	7/9/2021	[Redacted – First Amendment Privileged Membership Identity]	[Redacted – First Amendment Privileged Membership Identity]			0	First Amend.	Internal NAACP Communication from NAACP Legal to NAACP Leaders regarding Redistricting, Race, and Representation training on July 12, 2021.
6	KD0222WF00000219	msg	7/30/2021	[Redacted – First Amendment Privileged Membership Identity]	[Redacted – First Amendment Privileged Membership Identity]			0	First Amend.	Internal NAACP Communication from NAACP Training to NAACP Leaders regarding training and strategy, including redistricting training the week of August 2nd.
7	KD0222WF00003764	msg	10/26/2021	Roxy Hall Williamson	Galveston NAACP; Mary Patrick			1	First Amend.	Responsive portion of email is internal NAACP deliberative and strategic communication regarding redistricting with CROWD fellow contracted by NAACP to engage in community advocacy and education, Roxy D. Hall Williamson, and conveying confidential, internal, strategic advice regarding next steps in advocacy related to county redistricting to Galveston NAACP Branch President.
8	KD0222WF00003765	docx	10/26/2021						First Amend.	Nonresponsive attachment to privileged document KD0222WF00003764
9	KD0222WF00003766	msg	10/26/2021	Roxy Hall Williamson	Galveston NAACP; Mary Patrick			1	First Amend.	NAACP deliberative and strategic communication regarding redistricting attaching draft advocacy letter with CROWD fellow hired by NAACP to engage in community advocacy and education, Roxy D. Hall Williamson. Also mentions legal advice regarding advocacy letter.
10	KD0222WF00003767	pdf	10/26/2021						First Amend.	Attachment to NAACP deliberative and strategic communication regarding redistricting and draft advocacy letter with CROWD fellow hired by NAACP to engage in community advocacy and education, Roxy D. Hall Williamson.
11	KD0222WF00003683	msg	10/27/2021	Galveston NAACP	Mary Patrick			1	First Amend.	Responsive portion of email is internal NAACP deliberative and strategic communication regarding redistricting with CROWD fellow hired by NAACP to engage in community advocacy and education, Roxy D. Hall Williamson, and conveying confidential, internal, strategic advice regarding next steps in advocacy related to county redistricting to Galveston NAACP Branch President.
12	KD0222WF00003684	docx	10/27/2021						First Amend.	Nonresponsive attachment to privileged document KD0222WF00003683

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13	KD0222WF00003685	msg	10/27/2021	Galveston NAACP	Mary Patrick			1	Attorney-Client / First Amend.	NAACP deliberative and strategic communication regarding redistricting and draft advocacy letter with CROWD fellow hired by NAACP to engage in community advocacy and education, Roxy D. Hall Williamson. Also mentions request for legal advice regarding advocacy letter.
14	KD0222WF00003686	pdf	10/27/2021						First Amend.	Draft Letter, attachment to NAACP deliberative and strategic communication regarding redistricting and draft advocacy letter with CROWD fellow hired by NAACP to engage in community advocacy and education, Roxy D. Hall Williamson.
15	KD0222WF00003992	msg	3/9/2021	TX NAACP President Gary Bledsoe	Texas NAACP State Conference	[Redacted – First Amendment Privileged Membership Identity]		0	First Amend.	Responsive portion of email is internal NAACP Communication from TX NAACP Leadership to Branch NAACP Leaders regarding redistricting training workshop
16	KD0222WF00005354	msg	3/9/2021	Dickinson Bay-Area NAACP President Lucretia Lofton	TX NAACP President Gary Bledsoe			0	First Amend.	Responsive portion of email is internal NAACP Communication from TX NAACP Leadership to Branch NAACP Leaders regarding redistricting training workshop
17	KD0222WF00003915	msg	7/28/2021	Texas NAACP State Conference	[Redacted – First Amendment Privileged Membership Identity]	Texas NAACP		0	First Amend.	Responsive portion of email is internal NAACP Communication from TX NAACP Leadership to Branch NAACP Leaders regarding redistricting training and assistance from CROWD fellow hired by NAACP to engage in community advocacy and education, Roxy D. Hall Williamson.
18	KD0222WF00003886	msg	10/11/2021	Dickinson-Bay Area NAACP President Lucretia Lofton	[Redacted – First Amendment Privileged Member Identity]			0	First Amend.	Request for Redistricting Support from Dickinson-Bay Area NAACP President
19	KD0222WF00004204	msg	10/11/2021	Roxy Hall Williamson	Dickinson Bay-Area NAACP President Lucretia Lofton			1	First Amend.	NAACP deliberative and strategic communication between Dickinson Bay-Area Branch President and CROWD fellow hired by NAACP to engage in community advocacy and education, Roxy D. Hall Williamson.
20	KD0222WF00004205	pdf	9/1/2021					0	Non-privileged, non-responsive attachment to Privileged Communication	Attachment
21	KD0222WF00004206	msg	10/11/2021	Roxy Hall Williamson	Dickinson Bay-Area NAACP President Lucretia Lofton			0	First Amend.	NAACP deliberative and strategic communication between Dickinson Bay-Area Branch President and CROWD fellow hired by NAACP to engage in community advocacy and education, Roxy D. Hall Williamson.
22	KD0222WF00004100	msg	10/31/2021	Galveston NAACP	Dickinson Bay-Area NAACP President Lucretia Lofton; [Redacted – First Amendment Privileged Membership Identity]	Galveston NAACP President Mary Patrick		0	First Amend.	NAACP internal leadership communication between Mainland and Dickinson Bay-Area Unit leadership re redistricting
23	KD0222WF00004095	msg	11/1/2021	Galveston NAACP President Mary Patrick	Dickinson Bay-Area NAACP President Lucretia Lofton;			0	First Amend.	NAACP internal leadership communication between Mainland and Dickinson Bay-Area Unit leadership re redistricting

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24	KD0222WF00004088	msg	11/2/2021	Galveston NAACP President Mary Patrick	Mainland NAACP President Barbara Rice Anders; Dickinson Bay-Area NAACP President Lucretia Lofton			2	First Amend.	NAACP internal leadership communication re redistricting advocacy between presidents of Mainland, Dickinson Bay-Area, and Galveston NAACP branches
25	KD0222WF00004089	pdf	11/2/2021						First Amend.	Draft Letter, attachment to NAACP deliberative and strategic communication regarding redistricting and draft advocacy letter with CROWD fellow hired by NAACP to engage in community advocacy and education, Roxy D. Hall Williamson.
26	KD0222WF00004089	Bin	11/2/2021						Non-responsive, non-privileged attachment to privileged email	Blank attachment
27	KD0222WF00005335	msg	11/8/2021	Dickinson Bay-Area NAACP President Lucretia Lofton	Mainland NAACP President Barbara Rice Anders			0	First Amend.	NAACP internal leadership communication between Mainland and Dickinson Bay-Area Unit leadership re redistricting